

ARCTIC EXPRESS, INC.
DOCKET # FMCSA-2005-23239-11

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June 30, 2006

Dear Sir or Madam:

Arctic Express, Inc. respectfully submits these comments on the SafeStat model. We are a truckload, irregular-route carrier located in Hilliard Ohio with 240 power units.

Our greatest areas of concern with the SafeStat model center around the appropriateness and accuracy of the data on which the model is based.

Currently the model includes inappropriate data in measuring the safety status of a motor carrier. Specifically, the model partially relies on incidents which are not a reflection of the motor carriers safety record, and in fact are indicators that the motor carrier operates in a safe manor. These include incidents:

- Where the Commercial Motor Vehicle (CMV) was legally parked or legally stopped at a traffic light.
- Where the other driver was under the influence of drugs or alcohol or solely cited as responsible for the incident.

Similarly, the model has severe flaws in data validity and verification. We experienced an incident where a data-entry error categorized an accident where our driver was not cited and in which there were only minor injuries as an accident causing six fatalities!

Such inaccuracies place a high burden on each motor carrier to constantly monitor their data. More important, it takes a considerable length of time to resolve inaccuracies. During this time, the public data can have adverse consequences far out of proportion to the error. Ultimately, they could affect a motor carrier's ability to insure and could result in the demise of safe carriers, exactly the opposite of the goal of SafeStat.

We believe the SafeStat database must be accurate and appropriate before the model can work, and these needs are not currently addressed.

Sincerely,

Richard E. Durst
President and CEO
Arctic Express, Inc.

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